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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE PLAID INC. PRIVACY LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

Case No. 4:20-cv-03056-DMR

**STIPULATION TO ENTRY OF FINAL  
JUDGMENT AND DISMISSAL**

1 Pursuant to Civil Local Rule 7-12 and Federal Rule of Civil Procedure 58(d), Plaintiffs  
2 Caroline Anderson, James Cottle, Rachel Curtis, David Evans, Logan Mitchell, Alexis Mullen,  
3 Jordan Sacks, Frederick Schoeneman, Gabriel Sotelo, Jeffrey Umali, and Nicholas Yeomelakis, on  
4 behalf of themselves and the class that they represent, together with Defendant Plaid Inc., hereby  
5 stipulate to the attached Proposed Order for Final Judgment and Dismissal, and jointly request its  
6 entry by the Court. In support of their request, the parties state as follows:

7 1. The Court approved the class action settlement agreement and awarded certain  
8 attorneys' fees, costs, and service awards in this action on Wednesday, July 20, 2022. Dkt. 184.

9 2. The only outstanding matter in this action is the Post Distribution Accounting  
10 ("PDA") ordered by the Court. Dkt. 184 at 23. The parties believe that the Court does not intend  
11 the PDA to render its order non-final.

12 3. The parties understand the Court's July 20, 2022 order as having disposed of the  
13 case in its entirety. Nevertheless, Federal Rule of Civil Procedure 58(a) technically requires  
14 judgment to be set out in a separate document. *Casey v. Albertson's Inc.*, 362 F.3d 1254, 1258 (9th  
15 Cir. 2004).

16 4. To avoid any possible confusion about the time permitted to notice an appeal in this  
17 action, the parties stipulate to the Proposed Order for Final Judgment and Dismissal (Dkt. 156-2)  
18 and request its entry by the Court pursuant to Federal Rule of Civil Procedure 58(b)(2)(B). For the  
19 Court's convenience, a clean copy of the Proposed Order is attached hereto as Exhibit A.  
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22 [remainder of page intentionally left blank]  
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Dated: July 22, 2022

COOLEY LLP

By: /s/ Whitty Somvichian  
Whitty Somvichian  
Attorneys for Defendant Plaid Inc.

Dated: July 22, 2022

HERRERA KENNEDY LLP

By: /s/ Shawn M. Kennedy  
Shawn M. Kennedy  
Co-Lead Class Counsel

Dated: July 22, 2022

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By: /s/ Rachel Geman  
Rachel Geman  
Co-Lead Class Counsel

Dated: July 22, 2022

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By: /s/ Christopher J. Cormier  
Christopher J. Cormier  
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Co-Lead Class Counsel

**ATTESTATION**

I, Whitty Somvichian, am the ECF user whose ID and password are being used to file this **Stipulation to Entry of Final Judgment and Dismissal**. Pursuant to Civil L.R. 5-1(h)(3), I hereby attest that I have obtained the concurrence of the signatories in the filing of this document.

Dated: July 22, 2022

/s/ Whitty Somvichian  
Whitty Somvichian

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